REMARKS

Claims 1-3, 5-14, and 16-26 are pending in the Application, claims 4 and 15 having been previously canceled. Of the pending claims, claims 1, 12, 23, and 24 are independent. Applicants amend claims 1, 2, 5, 7, 12, 13, 16, 17, 23, and 24 herein. Applicants add new claim 27. Applicants contend the pending claims are in condition for allowance, and respectfully request that the Examiner pass the pending claims to allowance.

Applicants thank the Examiner for the courtesy of an interview on May 27, 2008.

I.   Amendments to the Claims

Applicants amend claims 1, 2, 5, 7, 12, 13, 16, 17, 23, and 24 to clarify the meaning of the word "value." In particular, some instances of the word "value" in the claims refer to a value specified by a user, while other instances of the word "value" refer to a value for a device in the network. The claims have been amended to clarify which values are "user-specified" values and which are simply "values" on the network devices.

Applicants amend claims 1, 12, 23, and 24 to specify that the user input "concurrently select[s]" a set of a plurality of network objects and that the set of the plurality of network objects have "a value the user desires to set to the user specified value." Further, claims 1, 12, 23, and 24 are amended to clarify that the user sets an object value "across" a plurality of network objects rather than "for" a plurality of network objects.

Claim 16 has been amended to change its dependency from claim 15, which had been previously canceled, to claim 12.

Claims 12 and 24 have been amended to recite "a computer system" in order to address the Examiner's 35 U.S.C. §101 concerns. Claim 23 has been amended to recite a "physical" computer-readable medium in order to address the Examiner's 35 U.S.C. §101 concerns.

II.   Objection to the Specification

The Examiner objects to the Specification at page 23, lines 16-20. The Examiner states "such means 'later developed' is non existing, so one cannot have/process, what's not even exist just yet." Applicants believe that the Examiner is referring to page 23, lines 18-20, which state that, for the means-plus-function limitations recited in the claims, the means are not limited to the means disclosed in the Specification, but cover any means, known now or later developed, for performing the recited function. In these lines, Applicants state that any means for performing the specified functions will suffice. What is claimed is not the as-yet-unknown means, but a system employing means to implement a certain functionality. One having ordinary skill in the art would understand how to deploy new means in order to implement the functionality described in the Application. Therefore, Applicants respectfully submit that the identified section of the Specification need not be corrected.

III.   Objection to the Drawings

The Examiner objects to the drawings (1-9) because they are "informal," and because Figures 4-6 are "not of sufficient quality." Applicants submit replacement sheets for Figures 1-9 herewith. No amendments have been made to the drawings.

IV.   Claim Rejections under 35 U.S.C. §101

Claims 12-14 and 16-24 have been rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. In particular, the Examiner suggests that "the claimed system [of claims 12 and 24] is constructed of software program instructions." The Examiner further suggests that "the medium [of claim 23] is not limited to physical articles or objects embodiments."

Applicants amend claims 12 and 24 to recite that the system is a "computer system" Therefore, the system components described in the claims are not software per se, but include a tangible computer system. Applicants contend that the amendment addresses the

Examiner's concerns regarding claims 12 and 24. Claims 13-14 and 16-22 depend from claim 12, and are therefore allowable for the same reason as claim 12.

Claim 23 has been amended to recite "a physical computer-readable medium." Therefore, the medium is limited to physical articles. Applicants contend that this amendment addresses the Examiner's concerns regarding claim 23.

V. Claim Rejections under 35 U.S.C. §103(a)

A. Claims 1-3

Claims 1-3 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,732,170 to Miyake et al. (hereafter "Miyake") in view of U.S. Patent Application no. 2002/0161876 to Raymond et al. (hereafter "Raymond"). Applicants respectfully traverse the rejection.

The claimed invention is generally directed to a system with a user interface that enables a user to concurrently select a plurality of network objects representing a plurality of different network devices of different network device types and specify a value, only once, to which to set the selected objects. The user can initiate setting of the selected objects representing the one or more different devices by specifying only once that the objects be set to the specified value.

One aspect of the claimed invention is that different network devices of different network device *types* can be managed. This allows a user to specify a value, only once, to set the network devices to, even when the network devices are of different types.

Miyake is generally directed to a network system capable of managing a plurality of types of logical networks (Miyake at Abstract). Display data is created for each of a plurality of types of logical network topologies for each object in accordance with collected information on the network topologies (Miyake at Abstract). Because different standards exist for implementing virtual networks and managing devices on a network (Miyake at col. 1, lines 42-63), when a plurality of virtual network methods are mixedly implemented in a network

environment, it is difficult for a system manager to conduct unified operation and management for all virtual networks (Miyake at col. 2, lines 1-4).

Because different virtual networks rely on their own implementation methods for reference and modifications to settings thereof (Miyake at col. 2, lines 9-11), it can be difficult to change the settings of the network topology. Miyake provides a network managing system for changing connection relationships for objects in the logical network (Miyake at col. 3, lines 13-15; col. 3, lines 23-25). When the connection relationship is to be changed in a respective virtual network segment, associated settings in a component device should be individually changed by servers dedicated to manage the respective virtual network segment. In this event, the system manager must know one by one correspondence relationships between the respective virtual network segments with respect to devices to be changed (Miyake at col. 2, lines 24-30).

Raymond is generally directed to a service information portal for providing customer-based management information of networked computing environments for Internet service providers, outsources, and enterprise service providers (Raymond at Abstract).

Applicants respectfully submit that Miyake and Raymond, alone or in combination, do not disclose or suggest *receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having the value the user desires to set to the user-specified value*, which is present in independent claim 1.

As discussed above, Miyake allows a user to manage a virtual network. This may require that the system change the "settings" of a device when that device is located in a network. However, when Miyake allows a user to make a change to the virtual network, the user does not *concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types*. Rather, Miyake appears to allow a user to select only one device of interest. For example, Miyake discusses *the controlled device 34* (Miyake at col. 8, lines 55-64). Miyake states that the network comprises *a controlled device subject to management* (Miyake at col. 8, lines 2-3). When a user makes a change to *a* controlled device, Miyake updates the network topology, and may update the "settings," meaning the connections in network topology, of other devices in the network. However, the

user selects only *a* device; Miyake does not *receiv[e] user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types*.

Further, the devices that Miyake controls do not represent a *plurality of different network device types*. Any network devices that Miyake controls at any one time are of a single, homogenous type (e.g., the same type of router). As can be seen in Miyake at Figure 18, Miyake handles each "type of device" in a *separate* processing loop. This means that only one device type is selected and updated at any one time. In contrast, claim 1 specifies that the user selects, and values are set for, *the plurality of different network device types*.

Raymond is also silent as to *receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having the value the user desires to set to the user-specified value*. There is no indication in Raymond that a plurality of network objects representing *different network device types* can be concurrently selected by a user. Further, there is no indication in Raymond that the objects representing different network device types have values that the user desires to set to a user-specified value. Rather, it seems that Raymond extracts specified information from relevant computing environment entities, and allows a network administrator to view this information on a customized display (Raymond at [0008]. Raymond does not allow a user to *concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types*, nor to set values for such network objects.

Therefore, Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest each and every element of independent claim 1. Claims 2 and 3 depend from claim 1 and, as such, include each and every element of claim 1. Therefore, Miyake and Raymond do not disclose or suggest each and every element of claims 2 and 3. Thus, Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. §103(a) rejection of claims 1-3.

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Claims 12-14

Claims 12-14 stand rejected under 35 U.S.C. §103(a) as being obvious under Miyake in view of Raymond. Independent claim 12 is a system claim corresponding to claim 1. Applicants respectfully submit that claim 12 is allowable for at least the same reasons as claim 1 above. In particular, Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest at least *instructions for receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having a value the user desires to set to the user-specified value*, which is present in claim 12.

Therefore, Applicants respectfully submit that Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest each and every element of claim 12. Claims 13 and 14 depend from claim 12 and, as such, include each and every element of claim 12. Therefore, Miyake and Raymond do not disclose each and every element of claims 13 and 14. Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. §103(a) rejection of claims 12-14.

B.   Claim 23

Claim 23 stands rejected under 35 U.S.C. §103(a) as being obvious under Miyake in view of Raymond. Independent claim 23 is a medium claim corresponding to claim 1. Applicants respectfully submit that claim 23 is allowable for at least the same reasons as claim 1 above. In particular, Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest at least the following features of claim 23: *receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having the value the user desires to set to the user-specified value.*

Therefore, Applicants respectfully submit that Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest each and every element of claim 23.

Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. §103(a) rejection of claim 23.

D.   Claims 24-26

Claims 24-26 stand rejected under 35 U.S.C. §103(a) as being obvious under Miyake in view of Raymond. Independent claim 24 is a system claim corresponding to claim 1. Applicants respectfully submit that claim 24 is allowable for at least the same reasons as claim 1 above. In particular, Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest at least the following features of claim 24: *means for receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having a value the user desires to set to the user-specified value*

Therefore, Applicants respectfully submit that Miyake and Raymond, alone or in any reasonable combination, do not disclose or suggest each and every element of claim 24. Claims 25 and 26 depend from claim 24 and, as such, include each and every element of claim 24. Therefore, Miyake and Raymond do not disclose each and every element of claims 25 and 26. Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. §103(a) rejection of claims 24-26.

E.   Claims 5-11 and 16-22

Claims 5-11 stand rejected under 35 U.S.C. §103(a) as being obvious under Miyake in view of Raymond, and further in view of U.S. Patent No. 6,829,615 to Schirmer et al. (hereafter "Schirmer"). Applicants respectfully traverse the rejection.

As discussed above, Miyake and Raymond do not disclose or suggest the features of independent claim 1, from which claims 5-11 depend, nor independent claim 12, from which claims 16-22 depend. Schirmer fails to cure the factual deficiencies of Miyake and Raymond.

Schirmer is generally directed to a computer- and software-based apparatus and method for managing and presenting information as a domain of data objects which can be grouped

according to their category or "object type," and which can be associated with other data objects, of same or differing object types, according to a myriad of relationship types (Schirmer at Abstract). Thus, Schirmer is directed to the management of data objects, and not to devices on a network. Schirmer is silent as to *receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having the value the user desires to set to the user-specified value*, which is present in claim 1. Further, Schirmer is silent as to the following elements of claim 12: *instructions for receiving user input to concurrently select a set of the plurality of network objects representing the one or more portions of the plurality of different network device types, the set of the plurality of network objects having a value the user desires to set to the user-specified value.*

Therefore, Miyake, Raymond, and Schirmer, alone or in any reasonable combination, do not disclose or suggest each and every element of independent claims 1 and 12. Thus, Miyake, Raymond, and Schirmer do not disclose or suggest each and every element of claims 5-11, which depend from claim 1 and therefore include each and every element of claim 1, or claims 16-22, which depend from claim 12 and therefore include each and every element of claim 12. Applicants respectfully request that the Examiner reconsider and withdraw the 35 U.S.C. §103(a) rejection of claims 5-11 and 16-22.

VI.   New Claim 27

Applicants add new claim 27. Claim 27 depends from claim 1, and is therefore allowable for at least the same reasons as claim 1, above. Applicants respectfully request that the Examiner pass new claim 27 to allowance.

CONCLUSION

In view of the above amendment, Applicants contend the pending application is in condition for allowance.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. ENB-008RCE from which the undersigned is authorized to draw.

Dated: May 27, 2008   Respectfully submitted,

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